

EXHIBIT 7

From: [REDACTED]

To: [REDACTED]

Subject: [EXTERNAL] RE: Further Discovery

Date: 2021-11-09 17:51:46 -0600

Importance: Normal

Attachments: coa.pdf; rx_labels.pdf; media_fill.pdf

Inline-Images: image001.png

Attached are a few of the items requested. Pending pH and fingerprints.



Sent from [Mail](#) for Windows

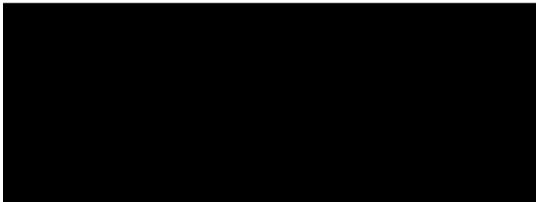
From: [REDACTED]

Sent: Tuesday, November 9, 2021 10:46 AM

To: [REDACTED]

Subject: RE: Further Discovery

Thanks so much



www.facebook.com/TNDepartmentofCorrection

<https://twitter.com/TNTDOC1>

<https://www.youtube.com/TNTDOC1>

From: [REDACTED]

Sent: Tuesday, November 9, 2021 11:10 AM

To: [REDACTED]

Subject: [EXTERNAL] RE: Further Discovery

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Good morning,

Yes I can get this together, I don't recall having provided any of these. Let me know if you need anything else.

Thanks



From: [REDACTED]
Sent: Tuesday, November 9, 2021 5:45 AM
To: [REDACTED]
Subject: Further Discovery

[REDACTED]

Below are listed additional discovery requests in the case....would you be able to tell what if any of this info you all have that hasn't already been sent my way? Thanks

- Any information recorded in the pharmacy's computer system related to the expiration dates of any Active Pharmaceutical Ingredients ("API") purchased by the pharmacy in its efforts to provide TDOC with lethal injection chemicals.
- Any certificates of analysis or other records documenting testing of the API purchased by the pharmacy in its efforts to provide TDOC with lethal injection chemicals.
- All records of pH testing conducted on drugs compounded by the pharmacy in its efforts to provide TDOC with lethal injection chemicals.
- All records of media fill testing conducted by the pharmacist and the pharmacy technician involved in preparing TDOC's lethal injection drugs from 2018 to present.
- All records of gloved fingertip sampling conducted by the pharmacist and the pharmacy technician involved in preparing TDOC's lethal injection drugs from 2018 to present.
- Copies of the labels printed on any drug compounded by the pharmacy in its efforts to provide TDOC with lethal injection chemicals.



[REDACTED]

www.facebook.com/TNDepartmentofCorrection
<https://twitter.com/TNTDOC1>
<https://www.youtube.com/TNTDOC1>

Tuesday, Apr 4, 2017

Me

[REDACTED] this is [REDACTED] is there a good time for me to give u a holler?

10:06 AM



Good morning [REDACTED]. I'll give you a call in an hour.

10:07 AM

Me

10-4 Just call this # in case I'm out of office thx

10:07 AM



Wednesday, Apr 5, 2017

Me

I'm running around today so not sure when I'll be open for a call but in the meantime can u send me a list of all companies etc u reached out to about sourcing so I can have it for when we have to show it's unavailable? Thanks

8:49 AM



Thursday, Apr 6, 2017



I'm not ignoring you I promise. Been getting over a nasty cold. I'm working on the list this morning. I'll have it to you soon.

9:16 AM

Me

10-4 Sorry ur sick in my voicemail I had a question about what type of pento y'all need cause I'm looking into a company and they needed to know which kind we wanted

9:17 AM



Me

Would ur pharmacist be available for me to ask him or her?

9:27 AM



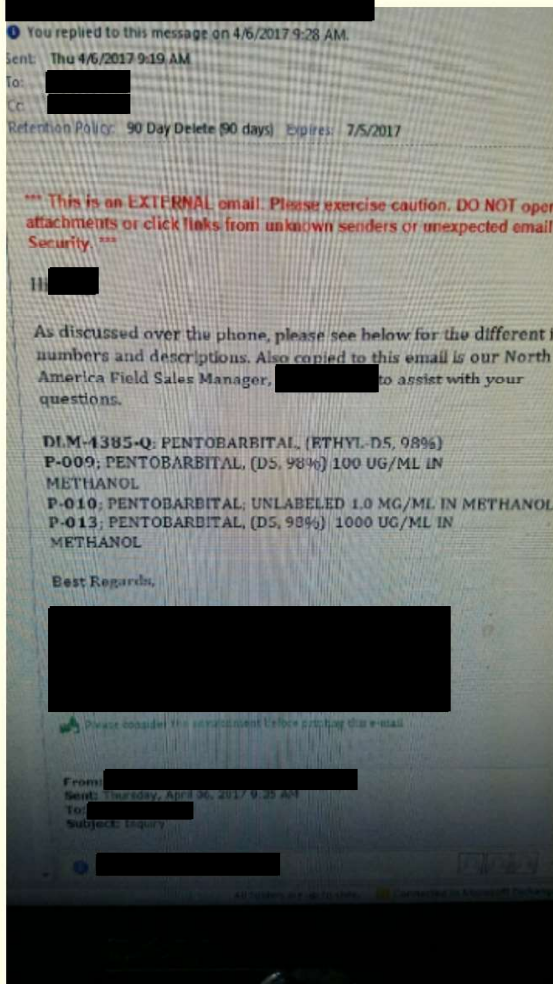
[REDACTED]
We would need USP grade.

I've spoken with the following with no luck:

Cardinal Health
McKesson
Medisca
PCCA
ANDA
Amerisource Bergen
Sigma Aldrich
Fisher Scientific
TCI America

9:52 AM

Me



9:55 AM

Me



Can u tell from that pic which of those would work?

9:55 AM



I don't think any of those would work for injection. I'm confirming with my pharmacist.

10:25 AM

Me



10-4

10:25 AM



Also those are such small quantities.

10:26 AM

Me

Well they do bulk options on things so once ur pharmacist says which one or what specific type we need I'll shoot that to them to see if possible

10:27 AM



If they have a crystalline option that would work. Methanol and ethanol are not injectable

10:33 AM

Me

Ok I've sent inquiry as to USP grade in crystalline form

10:37 AM



Me

Ok no dice with that company

11:03 AM



What are your thoughts on acquiring it through a veterinarian? They sometimes have better access to it since it's widely used for euthanasia in animals.

11:09 AM

Me

How would that even work? I'm wondering how the vet could legally transfer or sell the schedule 2 to y'all

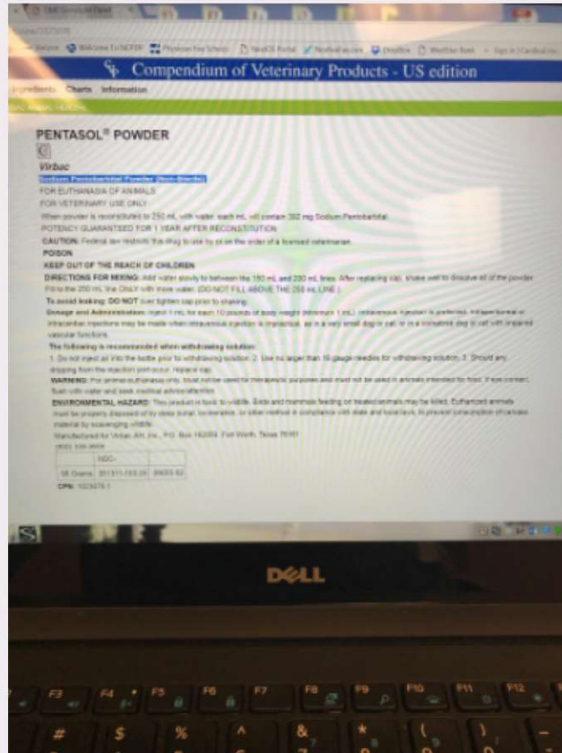
1:02 PM





Our pharmacy compounds drugs for animals and services veterinarians. I spoke with a vet this morning and they buy the stuff by the case.

2:27 PM



2:28 PM

Me

Let me do some looking into that possibility and talk with the bosses

2:43 PM



Thursday, Apr 13, 2017

Me

U got a free minute this afternoon for a call?

11:04 AM



Yes sir I do.

11:07 AM

Me

What time works for you ... I'm at lunch now but will be back in an hour

11:08 AM



That works for me.

11:08 AM

Me

10-4 ... I have some international ideas

11:09 AM



Thursday, Sep 14, 2017

Me

This is [REDACTED] and this is my cell #

9:15 AM



Monday, Oct 16, 2017



I'll call you back in a few. Stuck in a meeting.

11:38 AM

Me

10-4

11:38 AM



Me

Is now a good time by chance?

3:05 PM



Me

Governors office is hitting commissioner up daily wanting to know if anything have been obtained yet

3:09 PM



Me

By all means u can just shoot me an email with a break down of what you've ordered and received so far

3:41 PM



5 min. Sorry on the phone with drug supplier.

3:42 PM

Monday, Oct 23, 2017

Me

Hey [REDACTED]... spoke to folks at health about pharmacy reciprocal license and wanted to touch base with you on it...let me know a good time to holler

2:32 PM



Thursday, Dec 7, 2017

Me

Its [REDACTED]...Grabbing a bite but if it works for you could I holler afterwards to see how it all went?

4:57 PM



I've been out of the office all day. You may want to call [REDACTED] directly.

5:02 PM

Me

10-4 I'll try him after thanks

5:03 PM



Thursday, Dec 14, 2017

Me

I have what might be a dumb question ... do u have a free minute at or after 10 or 11 ur time?

9:45 AM



I'll have some time. Give me a shout. On another note, I have another pharmacist who will be taking the TN test. She wants to study for a couple weeks first.

9:54 AM

Me

Ok I'll give yippy a holler then. Has she scheduled a date with them yet so I can let the powers know? Also did [REDACTED] sign up to retake

9:56 AM



Me

I meant give you

9:56 AM



Me

Is there a particular "form" for ordering that we need to send you for the products?

1:16 PM



We'll create a prescription pad for you.

1:17 PM

Me

Ok I'm fairly certain we will be coming to pick up just gotta work out when and logistics... are there any particulars we need to know to store it for transport?

1:20 PM





I would have an insulated container.
No need for ice or anything. Just
needs to be kept at room temp.

1:21 PM

Me

general cooler be ok?

1:22 PM



That will work.

1:22 PM

Me

what documentation will we need
to bring for you guys when we
come? What schedule are all of
these drugs?

1:24 PM



Here's what we would need.

Prescription for in-office use signed
by medical director including their
DEA number and medical license
number.

Prescription should include all
medications needed with strength
and quantities. Midazolam is a CIII.

1:34 PM

Me

When you know can you tell me the
quantities you have thus far and
strengths because I imagine we
will want to pick it all up... so it has
to be issued/ requested by doctor?

1:57 PM



If you have someone at the TN board of pharmacy, you may want to check with them on [REDACTED] being able to fill for in office use. A medical director or pharmacist would need to sign for the order.

2:11 PM

Me

Ok so a pharmacist would also work?

2:12 PM



Im pretty sure but I'm double checking.

2:15 PM

Me

10-4

2:24 PM

Me

Is Pfizer the manufacturer of any of the products?

2:56 PM



The Midazolam is made by Pfizer.

3:24 PM

Monday, Dec 18, 2017

Me

So to make sure the scrip is written right to get everything can you tell what specific info needs to be in there to cover what y'all have in stock

9:24 AM

Wednesday, Dec 20, 2017

Me

Is there a good time to give you a call today?

9:55 AM



Yes sir. Let's do 11:00 MT.

9:56 AM

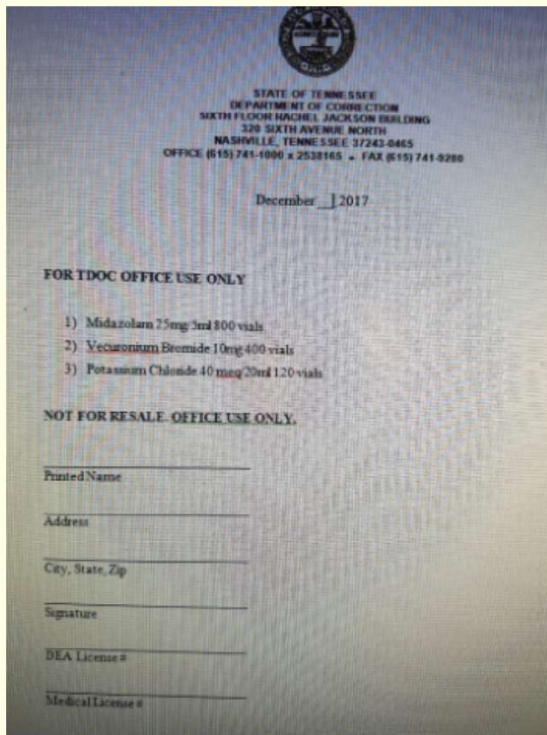
Me

10-4

9:56 AM



Me



10:54 AM



Me

Will this work for the order? I can fax it to you too look at if that's better

10:54 AM



That should do it.

Me

Ok I'll holler at 11 your time
10:55 AM



Me

just faxed order to you... let me know that you received it and that we are good and no changes our additions needed

2:14 PM



[REDACTED]
We have it and everything looks good.

2:58 PM

Me

10-4 Thanks and look forward to meeting y'all next week. If I don't talk to you before have a merry Xmas

2:59 PM



[REDACTED]
Thanks [REDACTED] Same here and merry Christmas to you too.

3:27 PM

Wednesday, Dec 27, 2017

Me

Hope you had a good holiday. Going to stay in [REDACTED] tonight and get to [REDACTED] early afternoon tomorrow. Will it work for us to go ahead and come by there when we arrive to pick everything up? Thx

2:58 PM



[REDACTED]
That works. We'll have everything ready to go.

3:00 PM

Me

10-4

3:01 PM



Me

Where would you recommend to get a [REDACTED]?

3:01 PM



The [REDACTED] on [REDACTED] is a nice choice.

3:25 PM

Me

Good deal

4:27 PM



Thursday, Dec 28, 2017

Me

Should be there between 12:30 and 1

11:29 AM



Sounds good.

11:30 AM

Me

We r here

1:39 PM



Thursday, Jan 11, 2018

Me

Any update by chance on testing dates for the two pharmacists?

11:45 AM



Friday, Jan 19, 2018



Hello [REDACTED] Do you have to jump on a call?

12:17 PM

Me

I'm in an all day hearing

12:31 PM



Me

Can I call after?

12:32 PM



Yes please. We have a little dilemma with our drug supplier.

12:33 PM

Me

10-4

1:50 PM



Me

How bad of a dilemma?

1:54 PM



They want their drugs back bad.

2:19 PM

Me

Just for fyi is there another supplier that's willing to supply if the current one falls through?

3:40 PM





9152083545

Well the problem is that Pfizer notified our supplier after they were alerted by the [REDACTED] and we are facing a "do not sell to" situation from Pfizer. It would not matter our supplier.

3:45 PM

Me

Someone from TDOC alerted Pfizer that we had some of their stuff?

3:46 PM

Me

Are they the only manufacturers of midazolam?

3:47 PM

Me

Sorry still in this hearing

3:47 PM



[REDACTED]
That is my understanding. I'll have to search for other manufactures but I don't think there are any who will allow us to purchase from them.

4:10 PM

Me

What's a good time on Monday that we can touch base?

4:36 PM

Me

I told commissioner what we know so far so he is naturally all on me for updates asap ... Thx

4:38 PM



[REDACTED]
I just got off the phone with my Cardinal rep. Here's what We know.

Pfizer was alerted that drugs from our pharmacy were sold to you all.

Cardinal is not sure what the end result will be but more than likely we'll be restricted from purchasing products in the future, they will seek to have the product returned, and possible termination of agreement. They are escalating it up their chain of command.

I'll make myself available anytime Monday so whatever works best for you all.

4:46 PM

Me

How about 10 your time?

4:50 PM



Me

Also while we r at it how about we explore other options on drugs ... ketamine etc if there seems to be an overall ban on midazolam ... I will research too thx

5:03 PM



[REDACTED]
10 works. I'll put it on the books.

5:12 PM

Me

Will do

5:12 PM



Monday, Jan 22, 2018

Me

Are u available now by chance? Got out of meeting a few minutes early

10:50 AM



Give me 5 min.

10:51 AM

Me

10-4

10:51 AM



<https://www.fiercepharma.com/pharma/pfizer-fight-states-over-their-intent-to-use-its-drugs-for-executions>

11:35 AM

Thursday, Jan 25, 2018

Me

When u can could u text me the contact info for the person at [REDACTED] [REDACTED]? Thx

10:00 AM



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:27 AM

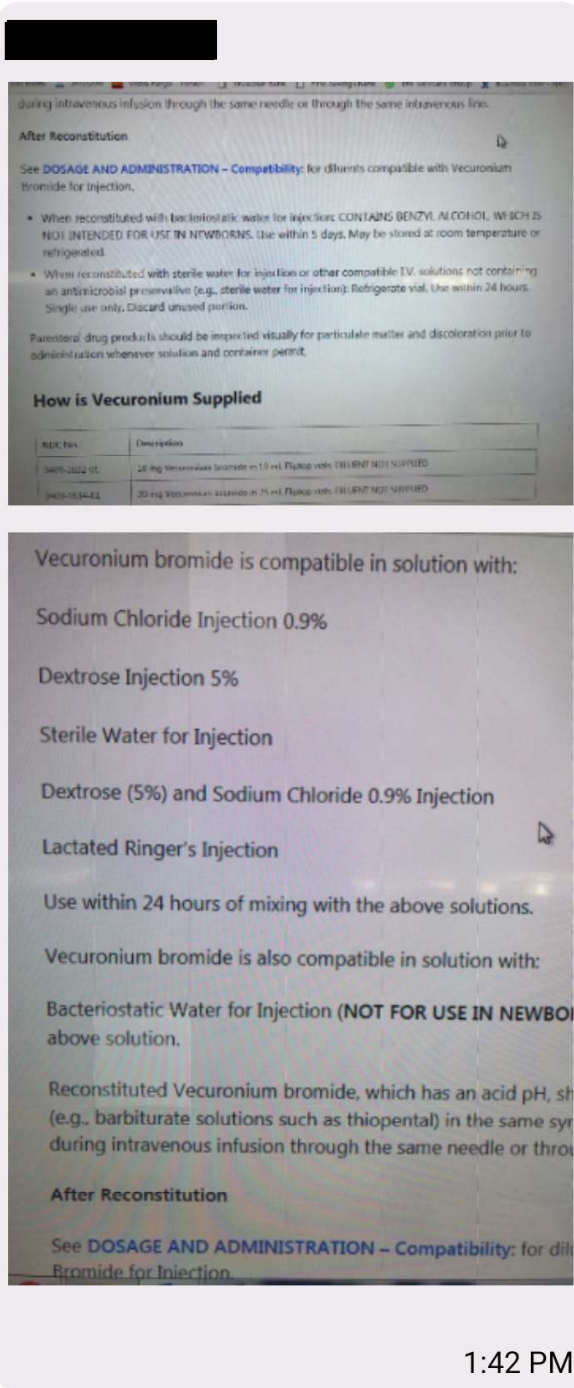
Me

Thanks

10:27 AM



Wednesday, Feb 7, 2018



Me

Good deal thanks

1:50 PM



Me

Supposedly according to [REDACTED]

getting it somehow so I am going to start cold calling around Virginia to see about that





Probably a good idea. FYI.... [REDACTED]
dropped our credit limit for orders
from \$210K to \$75K and eliminated
controlled substances.

1:59 PM

Me

Dang ... any indication if they are
gonna sue you or anything?

2:01 PM



Don't think so but it's still early. The
fact we still have an account is
promising.

2:03 PM

Me

Gotcha. Hopefully theyll leave it
alone from there. Well I'll see what I
dig up and we will chat on Monday
or before if something good
happens

2:05 PM

Monday, Feb 12, 2018

Me

A name that came up that may sell
the product is [REDACTED]
[REDACTED]...i haven't
tried calling them yet but wanted to
shoot u the info in case u knew of
them

11:02 AM

Tuesday, Feb 20, 2018

Me

Missed out weekly call yesterday
due to holiday. Anything new? Did
you have chance to call [REDACTED]
[REDACTED]?



[REDACTED]

3:49 PM



[REDACTED]
Sorry I missed your call earlier. I've been traveling all day. I just sent you an email from [REDACTED].

3:49 PM



[REDACTED]
That's voicemail not email.

3:50 PM

Me

Driving now but I'll give out a listen... thanks

3:53 PM



Wednesday, Feb 21, 2018

Me

U got a free minute any time tomorrow?

2:53 PM



[REDACTED]
Yes sir. Tomorrow morning at 10a MST.

2:54 PM

Me

I will call you then...thanks.

2:55 PM



Monday, Mar 5, 2018

Me

Would 10 am mst work for tomorrow to call?

1:40 PM



Yes sir. Sorry I missed today.

4:11 PM

Me

No worries I'll talk to you then thanks

4:12 PM



Tuesday, Mar 6, 2018

Me

Some of the vecuronium that we have came from [REDACTED] and they weren't on that restriction list would we still be able to order vecuronium through them?

1:34 PM



Monday, Mar 26, 2018

Me

Can u also send the code section for that reg on the 10% requirement on compounding

11:26 AM



Will do. 240 mEq is equal to 17880mg. We would just need to compound to that strength.

11:29 AM



It would essentially change from 2mEq/mL to 4mEq/mL

11:31 AM

Me

Ok so that would drop it from 120ml to 60 right?

11:31 AM



[REDACTED]
Correct.

11:32 AM

Me

So this new formulation would lessen the number of syringes that would be used as well

11:32 AM



[REDACTED]
Yes it would. Saving the state money.

11:33 AM

Me

10-4

11:33 AM



— Tuesday, Mar 27, 2018 —

Me

As u continue to order midazolam each month ... how often do you want to send us invoices?

10:50 AM



[REDACTED]
I can send monthly invoices.

11:11 AM

Me

Ok just wanna make sure y'all get paid ... so that first gram of midazolam is that being used to do the BUD etc?

11:13 AM





[REDACTED]
Not the whole gram. Just enough to
get the job done. On second thought
we probably won't Invoice you all
until we send the finished product.

11:15 AM

Me

Commissioner was wanting if
possible to pay as it comes in so
we have docs to make governor
happy that it is ours bought
and paid for ... and then could
we pay the additional costs of
compounding etc as it is done?

11:18 AM



[REDACTED]
Sure. We can do that.

11:18 AM

Me

Ok good deal ... Yeah I filled him
in on the continuing search for
vecuronium etc

11:20 AM



[REDACTED]
Can I call you later?

10:59 AM

Me

Yep

11:00 AM

Monday, Apr 2, 2018



Text Message
Mon, Jun 21, 1:26 PM

It's [REDACTED] do you have a few minutes to chat tomorrow at 10:30 or 12:30 your time? Need to update you on latest lawsuit

Yes that's not problem

Ok which time do you prefer?

Either works for me

Ok I'll holler at 10:30 your time

Sounds good

Thanks

Mon, Jul 26, 5:01 PM

Do you have a minute to touch base tomorrow?

Yes I'm pretty open just let me know when you want to call



iMessage





How about 10:30 your time

Actually do you have a quick second now?

I do

8 degrees Celsius is 46.4 Fahrenheit

As the refrigerator temperature correct

Yeah he googles it I just took his word. But the document said 45 degrees?

Document said 47

So too high by .6 degrees

Yes

So given that it goes into the fridge frozen then am I right that once it thaws at 47 degrees it would only have 24 hours to be used? So there is a cushion of time as it thaws



iMessage





So given that it goes into the fridge frozen then am I right that once it thaws at 47 degrees it would only have 24 hours to be used? So there is a cushion of time as it thaws before the 24 hour clock starts...or am I wrong on that

24 hours to be used, essentially when it's documented. Or the moment it's above that temperature range

Ok

Have you responded back to him with that info yet or did I need to let him know

I will tell him now

Thanks

Wed, Jul 28, 5:55 PM

I still plan to pick you up at the airport tomorrow and take you



iMessage





Wed, Jul 28, 5:55 PM

I still plan to pick you up at the airport tomorrow and take you to your hotel if that still the game plan

Yes that's good with me I can text you tomorrow if you want in case something changes with the flight

Also I emailed you what you requested just now

Ok ... I'll track flight as well ... text me when you land and I will drive up to pick you up outside baggage claim

Thu, Jul 29, 12:01 PM

Good afternoon [REDACTED]. My [REDACTED] decided to travel with me. If I need to take an Uber instead to my hotel it's not a problem. Thanks

It's fine I can pick you both up no problem



iMessage



11:23

LTE



It's fine I can pick you both up
no problem

Ok thank you

Thu, Jul 29, 1:59 PM

Hi [REDACTED] Just got off the plane,
making my way out, I didn't
check a bag

Ok ... I'll wait a minute or two
then head over

I'm in a red Ford Fusion

Sounds good

What are you wearing so I can
spot y'all

I'm in a black shoe and jeans
and glasses. My [REDACTED] is
6'3 with a long gray shirt

Fri, Jul 30, 6:55 AM

I'm a few minutes early so just
let me know when you're ready



iMessage



11:24

LTE



Fri, Jul 30, 6:55 AM

I'm a few minutes early so just let me know when you're ready and I'll pull up to front door of hotel

I'm ready

Ok

Fri, Jul 30, 6:10 PM

Hope it went ok and hope y'all enjoy Nashville

Wasn't the most fun I've ever had that la for sure

So sorry

My [REDACTED] ended up going to scotch and barrel and enjoyed it. Sk thank you! I'm sure the rest of my weekend will be much more enjoyable.

Good enjoy your trip

Thu, Sep 16, 11:08 AM



iMessage



11:24

LTE



Good enjoy your trip

Thu, Sep 16, 11:08 AM

can you tell me how much is left and expiration date of the potassium chloride and Midazolam ? Thx

Sure

Thanks

Thu, Sep 16, 1:06 PM

Can you also send me all inventory logs that you all have maintained for the chemicals for us?

Fri, Sep 17, 3:38 PM

Would you be able to send me the expiration date information and the inventory logs today?

Just emailed you, let me know if that is what you wanted

The KCL spreadsheet is blank



iMessage



11:24

LTE



Just emailed you, let me know if that is what you wanted

The KCL spreadsheet is blank

Ok

Mon, Oct 11, 11:32 AM

Any issues with ordering?

Still no luck with vecuronium, I do have the bacteriostatic water

What about potassium chloride?

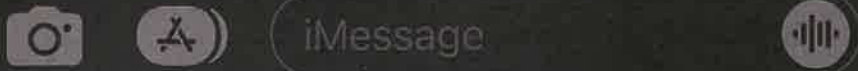
Waiting on receiving today

Thanks

Mon, Oct 18, 10:26 AM

Those formulas you sent are they proprietary to any particular company?

Wed, Oct 20, 11:31 AM





Those formulas you sent are they proprietary to any particular company?

Wed, Oct 20, 11:31 AM

Hi [REDACTED] sorry had an audit forgot to message you. Yes they are property of [REDACTED]

Ok thanks

Did the LIC come in?

Sorry LIC?

KCL

Yes it did

Great ... is there any light on when vecuronium will be available

I get same reject saying because of the [REDACTED] [REDACTED] and we are not allowed to order



iMessage



11:24

LTE



I get same reject saying because of the customer profile and we are not allowed to order

What does that mean?

[REDACTED]

Will you ever be able to order or is this still a COVID thing?

But I found another vendor that started to carry I'm trying to get

Gotcha

I am assuming it's because of COVID

Ok

Thu, Oct 21, 11:17 AM

Was able to get vecuronium, just ordered 2 to check expiration but it's 7/2023

Perfect



11:24

LTE



just ordered 2 to check
expiration but it's 7/2023

Perfect

Can we get more than 2
knowing the date is that far
out?

Thu, Oct 21, 2:08 PM

I will

Great thank s

Thu, Nov 4, 9:37 AM

How many vecuronium were
you able to get?

I'll double check when I get in.
but at the moment believe i
have 5

Good deal thanks

Thu, Nov 4, 10:58 AM

3 expiring 01/2023 and 2
expiring 07/2023



iMessage

